

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

PROMESA Title III

The Financial Oversight and Management  
Board for Puerto Rico,

No. 17 BK 3283 (LTS)

As representative of

(Jointly Administered)

The Commonwealth of Puerto Rico, the  
Employee Retirement System of the  
Government of the Commonwealth of Puerto  
Rico, and the Puerto Rico Public Buildings  
Authority

Debtors

**INFORMATIVE MOTION OF SUCESIÓN PASTOR MANDRY MERCADO,  
EXCEPTING JAVIER MANDRY MERCADO AS TO ITS OBJECTION TO SEVENTH  
AMENDED TITLE III JOINT PLAN OF ADJUSTMENT OF THE COMMONWEALTH  
OF PUERTO RICO, ET. AL.**

**TO THE HONORABLE COURT:**

By counsel, Oscar Adolfo Mandry Aparicio; María del Carmen Amalia Mandry Llombart; Selma Verónica Mandry Llombart; María del Carmen Llombart Bas; Oscar Adolfo Mandry Bonilla; Gustavo Alejandro Mandry Bonilla; Yvelise Helena Fingerhut Mandry; Margaret Ann Fingerhut Mandry; Victor Robert Fingerhut Mandry; Juan Carlos Esteva Fingerhut; Pedro Miguel Esteva Fingerhut; Mariano Javier McConnie Fingerhut; Janice Marie McConnie Fingerhut, Victor Michael Fingerhut Cochran; Michelle Elaine Fingerhut Cochran; Rosa Estela Mercado Guzmán; Eduardo José Mandry Mercado; Salvador Rafael Mandry Mercado; Margarita Rosa Mandry Mercado; Adrián Roberto Mandry Mercado (hereafter collectively designated as “Sucesión Pastor Mandry Mercado”), hereby submits this informative motion. In support thereof Sucesión Pastor Mandry Mercado respectfully states as follows:

1. On August 31, 2021, Sucesión Pastor Mandry Mercado, the holder of Amended Proof of Claim Number 6272 for \$30,496,000.00 arising from an inverse condemnation final judgment entered by the Court of First Instance of Puerto Rico, Superior Section of Ponce (the “Judgment”), filed its *Objection To “Seventh Amended Title III Joint Plan Of Adjustment Of The Commonwealth Of Puerto Rico, Et. Al.”* (**Docket No. 17998**).

2. In the first paragraph of the Introduction to the Objection, Sucesión Pastor Mandry Mercado stated that the Judgment was on appeal to the Puerto Rico Court of Appeals.

3. In order to update the aforesaid, Sucesión Pastor Mandry Mercado informs that on September 14, 2021, the Puerto Rico Court of Appeals entered judgment confirming the Judgment.

4. Sucesión Pastor Mandry Mercado is in the process of obtaining a certified translation to the English language of the judgment of the Court of Appeals, which will be filed as a supplement to its proof of claim.

**WHEREFORE**, Sucesión Pastor Mandry Mercado respectfully requests that the Court take notice of the foregoing.

San Juan, Puerto Rico, this 28<sup>th</sup> day of September 2021

**s/CHARLES A. CUPRILL-HERNÁNDEZ**  
**USDC-PR 114312**

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